

Samuel Heins, Esq.
Bryan L. Crawford, Esq.
Daniel E. Gustafson, Esq.
HEINS, MILLS & OLSON, P.C.
3550 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 338-4605
Facsimile: (612) 338-4692

Marc H. Edelson, Esq.
HOFFMAN & EDELSON
45 West Court Street
Doylestown, PA 18901
Telephone: (215) 230-8043
Facsimile: (215) 230-8735

Kenneth A. Wexler, Esq.
Elizabeth Fegan Hartweg, Esq.
THE WEXLER FIRM
One North LaSalle Street, Suite 2000
Chicago, IL 60602
Telephone: (312) 346-2222
Facsimile: (312) 346-0022

Eugene A. Spector, Esq.
Jeffrey L. Kodroff, Esq.
John A. Macoretta, Esq.
SPECTOR, ROSEMAN & KODROFF, P.C.
1818 Market Street, Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300
Facsimile: (215) 496-6611

ON BEHALF OF DEFENDANTS

By /s/ Nicholas C. Theodorou
Nicholas C. Theodorou, Esq. (BBO# 496730)
Jessica Barnett, Esq. (BBO# 650535)
FOLEY HOAG, LLP
155 Seaport Boulevard
Boston, MA 02210

DATED: April 1, 2005

D. Scott Wise, Esq. (admitted *pro hac vice*)
Kimberley Harris, Esq. (admitted *pro hac vice*)
DAVIS POLK & WARDWELL
450 Lexington Avenue
New York, NY 10017
Attorneys for Defendant AstraZeneca Pharmaceuticals]

CERTIFICATE OF SERVICE

I hereby certify that I, Thomas M. Sobol, an attorney, caused a true and correct copy of the foregoing Status Report to be served on all counsel of record electronically on April 1, 2005, pursuant to Section D of Case Management Order No. 2.

/s/ Thomas M. Sobol

Thomas M. Sobol, Esq.
HAGENS BERMAN LLP
One Main Street, 4th Floor
Cambridge, MA 02142
Telephone: (617) 482-3700
Facsimile: (617) 482-3003

MDL 1456 STATUS CHART – GOVERNMENT ENTITY CASES

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
Montana v. Abbott Labs., Inc. et al.	02-CV-12084-PBS	Removed to D. Mont.	<ul style="list-style-type: none"> November 24, 2004 – Watson Pharmaceuticals, Inc.’s Motion to Dismiss the State of Montana’s Second Amended Complaint <ul style="list-style-type: none"> December 8, 2004 – State of Montana’s Opposition to Motion to Dismiss the State of Montana’s Second Amended Complaint December 16, 2004 – Watson Pharmaceuticals, Inc.’s Reply Memorandum in Support of Motion to Dismiss the State of Montana’s Second Amended Complaint (leave to file granted December 21, 2004)
Nevada v. American Home Products, Inc. et al (“Nevada II”)	02-CV-12086-PBS	Removed to D. Nev.	<ul style="list-style-type: none"> November 24, 2004 – Watson Pharmaceuticals, Inc.’s Motion to Dismiss the State of Nevada’s Amended Complaint <ul style="list-style-type: none"> December 8, 2004 – State of Nevada’s Opposition to Motion to Dismiss the State of Nevada’s Second Amended Complaint December 16, 2004 – Watson Pharmaceuticals, Inc.’s Reply Memorandum in Support of Motion to Dismiss the State of Nevada’s Second Amended Complaint (leave to file granted December 21, 2004)
California <i>ex rel.</i> Ven-A-Care of the Florida Keys, Inc. v. Abbott Labs., Inc. et al.	03-CV-11226-PBS	Removed to C.D. Cal.	<ul style="list-style-type: none"> No pending motions
County of Nassau v. Abbott Labs., Inc. et al.	n/a	E.D.N.Y.	<ul style="list-style-type: none"> December 10, 2004 – Notice of Related Action filed with the Judicial Panel on Multidistrict Litigation January 4, 2005 – JPMDL issued conditional transfer order January 28, 2005 – case officially transferred to MDL March 8, 2005 –Order Granting Defendants’ Motion for a Case Management Conference and Coordination of Pleadings March 17, 2005 –Case Management Conference Set for April 8, 2005

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
<p>County of Suffolk v. Abbott Labs., Inc. et al.</p>	<p>03-CV-10643-PBS</p>	<p>E.D.N.Y.</p>	<ul style="list-style-type: none"> • Certain Defendants' Motions to Dismiss Suffolk County's Amended Complaint <i>sub judice</i> <ul style="list-style-type: none"> ○ October 26, 2004: Memorandum and Order dismissing Purdue Pharma L.P., Ivax Corporation, Ivax Pharmaceuticals, Sanofi-Synthelabo Inc., Aventis Pharmaceuticals Inc., and Novartis, and deferring ruling on individual motions to dismiss filed by the "Suffolk 13" and individually by certain other defendants, and ordering plaintiff to make disclosures and provide more definitive statement pursuant to Fed. R. Civ. P. 12(e) <ul style="list-style-type: none"> ▪ November 16, 2004 – Suffolk County's Affidavit of Aaron D. Hovan Providing (1) Methodology and Documents Used to Estimate AWP Spread and (2) Additional Information Regarding Defendants filed in Response to October 26, 2004 Order ▪ November 30, 2004 – Individual and Joint Responses to Suffolk County's Supplemental Filing in Response to the Court's October 26, 2004 Order ▪ December 8, 2004 – Suffolk County's Motion for Leave to File a Reply in Further Response to the Court's October 26, 2004 Order <ul style="list-style-type: none"> • January 10, 2005 – Suffolk County's Motion for Leave to File a Reply in Further Response to the Court's October 26, 2004 Order Granted • March 30, 2005 –County of Suffolk's Motion to Renew Its Second Motion to Compel the Production of Discovery From the Schering-Plough Corporation • March 8, 2005 –Order Granting Defendants' Motion for a Case Management Conference and Coordination of Pleadings • March 17, 2005 –Case Management Conference Set for April 8, 2005

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
County of Rockland v. Abbott Labs., Inc. et al.	03-CV-12347-PBS	S.D.N.Y.	<ul style="list-style-type: none"> March 8, 2005 –Order Granting Defendants’ Motion for a Case Management Conference and Coordination of Pleadings March 17, 2005 –Case Management Conference Set for April 8, 2005
County of Westchester v. Abbott Labs., Inc. et al.	n/a	S.D.N.Y.	<ul style="list-style-type: none"> March 8, 2005 –Order Granting Defendants’ Motion for a Case Management Conference and Coordination of Pleadings March 17, 2005 –Case Management Conference Set for April 8, 2005
City of New York v. Abbott Labs., Inc. et al.	n/a	S.D.N.Y.	<ul style="list-style-type: none"> September 24, 2004 – Conditional transfer order issued by Judicial Panel on Multidistrict Litigation; no opposition filed October 18, 2004 – case officially transferred to MDL March 8, 2005 –Order Granting Defendants’ Motion for a Case Management Conference and Coordination of Pleadings March 17, 2005 –Case Management Conference Set for April 8, 2005
County of Onondaga v. Abbot Labs., Inc. et al.	n/a	S.D.N.Y.	<ul style="list-style-type: none"> February 9, 2005 – Notice of Related Action filed with the JPMDL

MDL 1456 STATUS CHART – PRIVATE CLASS CASES

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action	Master File 01-CV-12257-PBS	D. Mass. pursuant to JPML Order	<ul style="list-style-type: none"> • May 3, 2004 – Plaintiffs’ Motion to Compel The Production of Documents Created During the Relevant Time Period from Defendants Abbott Laboratories, Astrazeneca, Schering Plough, Sicom and Together Rx Defendants <i>sub judice</i> (Magistrate Bowler) <ul style="list-style-type: none"> ○ May 17, 2004 – Certain Defendants’ Notice of Opposition to Plaintiffs’ Motion to Compel the Production of Certain Documents and Consent Motion for an Extension of Time ○ May 26, 2004 – Notice of Withdrawal of Plaintiffs’ Motion to Compel the Production of Documents Created During the Relevant Time Period Directed at Defendant Schering–Plough (<i>Note: withdrawal applies only to Schering-Plough</i>) ○ May 27, 2004 – Consent Motion for an Extension of Time to Oppose the Motion to Compel ○ May 27, 2004 – Opposition of the Together Rx Defendants to Plaintiffs’ Motion to Compel the Production of Documents ○ May 28, 2004 – Notice Of Withdrawal Of Plaintiffs’ Motion To Compel The Production Of Documents Created During The Relevant Time Period Directed At Defendant Abbott Laboratories (<i>Note: withdrawal applies only to Abbott Laboratories</i>) ○ June 8, 2004 – Notice of Withdrawal of Plaintiffs’ Motion to Compel the Production of Documents Created During the Relevant Time Period Directed at Defendant AstraZeneca. (<i>Note: withdrawal applies only to AstraZeneca</i>) ○ June 9, 2004 – Plaintiffs’ Reply Memorandum In Support of Motion To Compel The Production of Documents Created During The Relevant Time Period From The Together Rx Defendants ○ June 22, 2004 – Order granting Plaintiffs’ Motion to Withdraw Motion to Compel Directed at Abbott Laboratories ○ June 22, 2004 – Order granting AstraZeneca’s Assented to Motion for Extension of Time to File Response to Plaintiffs’ Motion to Compel ○ June 22, 2004 – Order finding as Moot AstraZeneca’s Motion for Extension of Time to Oppose Plaintiffs’ Motion to Compel ○ Awaiting scheduling of hearing or ruling by Court as to Together Rx Defendants.

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action (continued)			<ul style="list-style-type: none"> • September 3, 2004 – Plaintiffs’ Motion for Class Certification <i>sub judice</i> (Judge Saris) <ul style="list-style-type: none"> ○ October 25, 2004 – Track 1 Defendants’ Consolidated and Individual Opposition to Plaintiffs’ Motion for Class Certification, with supporting declarations and exhibits ○ December 17, 2004 – Plaintiffs’ Amended Motion for Class Certification ○ December 17, 2004 – Plaintiffs’ Reply Memoranda to Consolidated and Individual Oppositions to Plaintiffs’ Motion for Class Certification ○ January 21, 2005 – Track 1 Defendants’ Consolidated and Individual Surreplies to Plaintiffs’ Motion for Class Certification, with supporting declarations and exhibits ○ February 8, 2005 – Memorandum of the Attorney General of the Commonwealth of Pennsylvania in Opposition to Class Certification. ○ February 10, 2005 – State of California’s and Relator’s Statement of Position Regarding Certification of Class ○ March 10, 2005 – Track One Defendants’ Comments on the Report of Dr. Ernst R. Berndt ○ March 10, 2005 – Plaintiffs’ Memorandum Regarding the Berndt Report ○ March 25, 2005 – Order of Judge Patti B. Saris striking Rebuttal Declaration of Raymond S. Hartman in Response to the Sur-Reply Declaration of Steven J. Young. • October 25, 2004 – Motion to Strike the Declaration of Raymond S. Hartman <i>sub judice</i> (Judge Saris) <ul style="list-style-type: none"> ○ October 25, 2004 – Memorandum in Support of Motion to Strike the Declaration of Raymond S. Hartman ○ November 30, 2004 – Track 1 Defendants’ Motion to Strike the Declaration of Raymond S. Hartman ○ December 17, 2004 – Plaintiffs’ Memorandum in Opposition to Motion to Strike the Declaration of Raymond S. Hartman ○ January 21, 2005 – Track One Defendants Reply in Support of Their Motion to Strike the Declaration of Raymond S. Hartman • December 17, 2004 – Plaintiffs’ Motion to Strike the Declaration of Eric M. Gaier, Ph.D <i>sub judice</i> (Judge Saris)

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action (continued)			<ul style="list-style-type: none"> ○ January 21, 2005 – Track One Defendants Opposition to Plaintiffs’ Motion to Strike the Declaration of Eric M. Gaier, Ph.D ○ February 2, 2005 – Plaintiffs’ Reply in Support of Their Motion to Strike the Declaration of Eric M. Gaier, Ph.D • December 17, 2004 – Plaintiffs’ Motion to Strike the Declaration of Steven J. Young <i>sub judice</i> (Judge Saris) <ul style="list-style-type: none"> ○ January 21, 2005 – Track One Defendants Opposition to Plaintiffs’ Motion to Strike the Declaration of Steven J. Young ○ February 4, 2005 – Plaintiffs’ Reply in Support of Their Motion to Strike the Declaration of Steven J. Young • December 17, 2004 – Plaintiffs’ Motion to Strike Portions of the Declaration of Robert P. Navarro <i>sub judice</i> (Judge Saris) <ul style="list-style-type: none"> ○ January 21, 2005 – Track One Defendants Opposition to Plaintiffs’ Motion to Strike Portions of the Declaration of Robert P. Navarro ○ February 2, 2005 – Plaintiffs’ Reply in Support of Their Motion to Strike Portions of the Declaration of Robert P. Navarro • January 21, 2005 – Third Party Toledo Clinic Inc.’s Motion to Quash Defendants’ Subpoena <ul style="list-style-type: none"> ○ February 15, 2005 – Plaintiffs’ Memorandum in Opposition to Toledo Clinic Inc.’s Motion to Quash Defendants’ Subpoena • February 3, 2005 – Plaintiffs’ Motion to Compel Defendant GlaxoSmithKline, Inc. to Produce Rule 30(b)(6) Witnesses <ul style="list-style-type: none"> ○ Awaiting scheduling of hearing in front of Magistrate Bowler • February 3, 2005 – Plaintiffs’ Motion to Compel Defendant GlaxoSmithKline, Inc. to Produce Documents in the Manner Required by Rule 34(b) <ul style="list-style-type: none"> ○ Awaiting scheduling of hearing in front of Magistrate Bowler • February 3, 2005 – Plaintiffs’ Motion to Compel and for Finding that AstraZeneca’s Pricing, Marketing, and Sales of its Products are not Protected by the Attorney-Client Privilege <ul style="list-style-type: none"> ○ February 24, 2005 – AstraZeneca Pharmaceuticals LP’s Opposition to Plaintiffs’ Motion to Compel and for Finding that AstraZeneca’s Pricing, Marketing, and Sales of its Products are not Protected by the

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action (continued)			<p>Attorney-Client Privilege, and Cross-Motion for a Protective Order Relating to the April 2, 2004 Amended Notice of Rule 30(b)(6) Deposition</p> <ul style="list-style-type: none"> ○ March 20, 2005 – Reply in Support of Plaintiffs’ Motion to Compel and For Finding That Documents and Testimony Related to AstraZeneca’s Pricing, Marketing and Sales of Its Products Are Not Protected by the Attorney-Client Privilege and Opposition to AstraZeneca’s Cross-Motion for a Protective Order <ul style="list-style-type: none"> • February 23, 2005 – Third Party Schaller Anderson Inc.’s Objection and Motion to Quash Plaintiffs’ Subpoena. • March 10, 2005 – Plaintiffs’ Motion to Strike Sur-Reply Declaration of Steven J. Young <ul style="list-style-type: none"> ○ Response due Apr. 7, 2005, pursuant to this Court’s Mar. 24, 2005, Order • March 14, 2005 – Plaintiffs’ Motion for Sanctions Based on Defendants’ Submittal of Surreply Declaration of Steven J. Young <ul style="list-style-type: none"> ○ Response due Apr. 7, 2005, pursuant to this Court’s Mar. 24, 2005, Order • March 21, 2005 – B. Braun Medical Inc.’s Motion to Dismiss the Second Amended Master Consolidated Class Action Complaint <ul style="list-style-type: none"> ○ Response due Apr. 4, 2005
Congress of California Seniors v. Abbott Labs., Inc. et al.	03-CV-10216-PBS	Removed to C.D. Cal.	<ul style="list-style-type: none"> • Consolidated into Master Class Action
International Union of Operating Engineers, Local No. 68 Welfare Fund v. AstraZeneca PLC et al.	04-11503-PBS	Removed to D.N.J.	<ul style="list-style-type: none"> • Motion to Remand filed in District of New Jersey prior to transfer; briefed while pending in District of New Jersey • February 9, 2005 –Scheduling conference set for April 8, 2005